

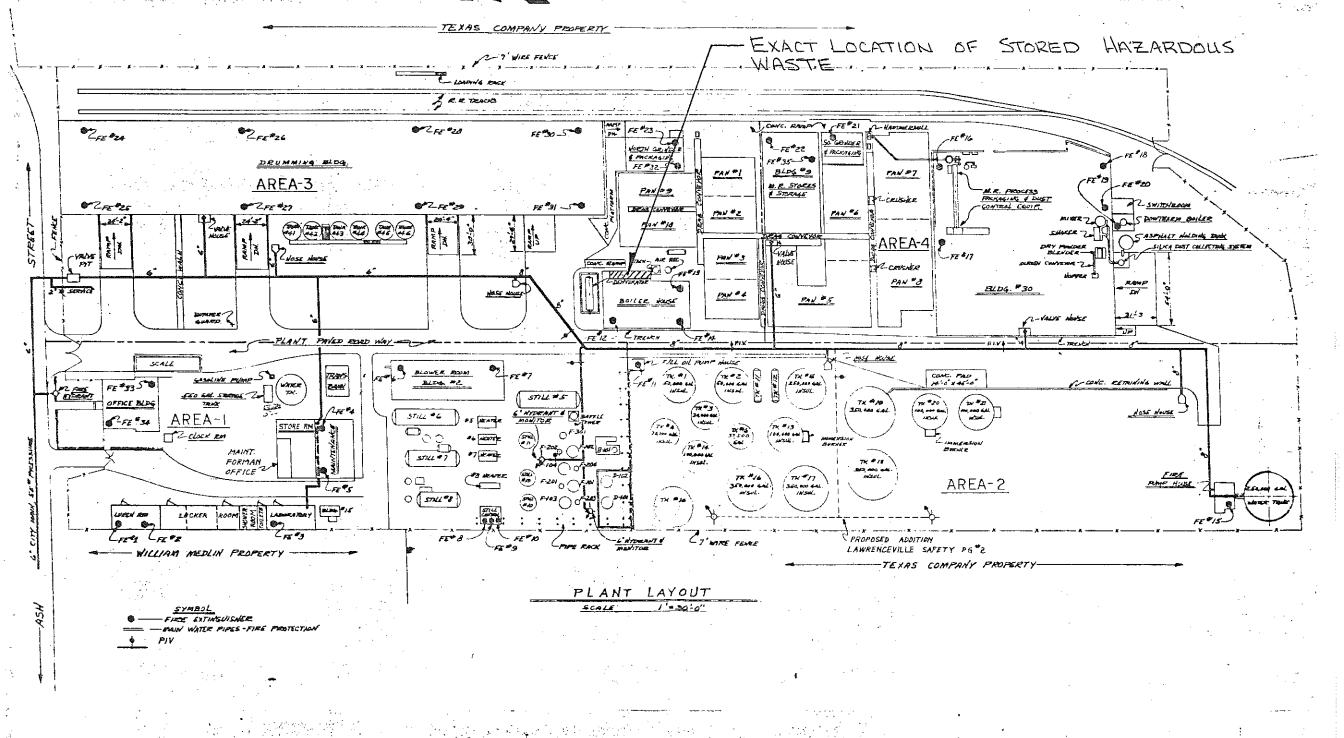
ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY (VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D.	NUMBER	*	ILD006301840	REACKNOWLED	GEMENT
			WITCO CHEMICAL PO BOX 535 LAWRENCEVILLE	CORP: :IL	62439
INSTALLATION	ADDRESS		602 ASH ST LAWRENCEVILLE	i.	62439

EPA Form 8700-12B (4-80)

09/20/81





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION V

111 West Jackson Blvd. CHICAGO, ILLINOIS 60604 into No

REPLY TO ATTENTION OF:

RCRA ACTIVITIES

1 0 NOV 1982

Mr. H. C. Goodwin, Plant Manager Witco Chemical Company Post Office Box 535 Lawrenceville, Illinois 62439

RE: Request for Information--Hazardous Waste Permit Review (Raw Material Storage)

FACILITY: Witco Chemical Company USEPA ID NO.: ILD 006 301 840

Dear Mr. Goodwin:

This is to acknowledge that the United States Environmental Protection Agency has completed reviewing your Part A Hazardous Waste Permit Application. Our review indicates your facility may not require a permit under §3005 of the Resource Conservation and Recovery Act; however, further clarification is needed.

Based on the information submitted, your facility appears to store only raw materials at your facility, and raw materials do not meet the definition of a solid waste. If this is the case, a permit is not required, and you may withdraw your permit application. Please submit your determination in writing, signed and certified by an authorized person in accordance with 40 CFR Part 122.6 (enclosed), requesting that your application be withdrawn.

If your review indicates that a permit is required, but certain information on your application is incorrect, please submit a revised Part A with the appropriate changes to this Regional Office. If no response is received in this office within 30 days, we will assume your facility requires a permit. Accordingly, we will continue to process your application.

If you have any questions, please contact the Technical, Permits, and Compliance Section at (312) 353-2197 for assistance. Please refer to "Request for Information--Raw Material Storage," in all correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief

Waste Management Branch

Enclosure

cc: Mr. M. MacBurney, General Manager

Witco

Organics Division

Witco Corporation, 6200 West 51st Street, Chicago, Illinois 60638 Chicago (312) 767-8771 Suburbs (312) 458-0765 Cable Address: Witcochem

ID006 301840

RCRA Activities Region V P.O. Box A3587 Chicago, IL 60690

Attention: ATKJG

Gentlemen:

In response to your questionnaire involving "Certification regarding Potential Releases from Solid Waste Management Units", I was advised by Mr. Jim Mayka (of your office) to submit a letter describing past and present waste practices at the facility (ILD074405150).

The facility does not operate any of the solid waste management units listed under question No. 1. No off-site waste is accepted for treatment, disposal or storage. The container storage area was previously shown in the Part A application.

There exists three sources of waste at the facility. The first source is generated at the plant's waste water treatment plant. All process and storm water is treated by the treatment plant prior to discharge to the public sewer system; this treatment generates a hydrated sludge. sludge has been analyzed and classed as "Non-Hazardous-Special Waste". It is manifested and transported to the C.I.D. #2 Landfill in Calumet City, IL. There has been no release of waste from this operation.

The second source is a flammable waste generated during the production of Hydrotropes. The waste consists of an amount of solvent (Xylene) mixed with sulfones and water. The waste is drummed and stored on site until a truckload quantity is accumulated, at times in excess of ninety days. The waste is classed as "Hazardous", due to ignitability. It is manifested and transported to the E.W.R. facility in Coal City, IL. There has been no release of waste from this operation.

It is felt that the above descriptions will provide the information you require concerning this facility. If additional information is needed, please contact me.

Very truly yours,

WITCO CORPORATION

acques V. de Journo

Jacques V. de Journo Supervisor of Safety & Environmental Services

JVdeJ/bp

cc: L. McGrenera - Clearing

A. Scivolette - Woodcliff H. Bikofsky - Woodcliff



Pioneer Division

Witco Chemical Corporation, 802 Ash Street, Lawrenceville, Illinois 62439 Telephone (618) 943-3341

October 22, 1980

Regional Project Officer EPA Region V RCRA Activities P. O. Box 7861 Chicago, IL 60680

Dear Sir:

We are transmitting to you by attachment a corrected copy (subsequent notification) of the Notification of Hazardous Waste Activity form. Please note that in Section VI we have crossed off generation in addition to treat/store/dispose. Also please note that in Section IX, Subpart E, we have crossed off corrosive as well as toxic.

Will you please correct your records accordingly.

Very truly yours,

WITCO CHEMICAL CORPORATION

Pioneer Division

Hal C. Goodwin Plant Manager

HCG:pkr

Enclosure



Pioneer Division Witco Chemical Corporation, 277 Park Avenue, New York, N.Y. 10017 (212) 872-4357

October 30, 1980

E. P. A.-Region V RCRA Activities P. O. Box 7861 Chicago, Illinois 60680

Gentlemen:

We have executed the attached permit application and maps required for Storage of Hazardous Wastes. These forms cover the Pioneer Division of Witco location at Lawrenceville, Illinois.

Included with the topographical map, are a blueprint entitled "General Plant Facilities" and E. P. A. forms 3510-1 (6-80) and 3510-3 (6-80). The Facility drawing included is Page 5 of form #3510 (6-80)

If there is any other information required, we shall be pleased to comply.

Very truly yours,

I. W. Yarbrough

Vice President - Operations

k

Enclosures

WASTE MANAGEMENT BRANCH EPA REGION V

NOV 1 4 1980

Certified Mail -Return Receipt Req.

ENGINORMENTAL PRODUCTION AGENC REGION V

111 West J. chaon fillyd. CHICAGO, ILLINOIS 60504

REPLY TO ATT STIDN OF:

RCRA ACT: TITLES

Mr. Harvey L. . lubock, Vice President Witco Chemical Corporation 802 Ash Street Lawrenceville, IL. 62439

> .RE: Withdrawal of Part A (Non-Hazardous Maste) FACILITY NAME: Witco Chemical Corporation USEPA In No.: ILD 006 301 840

Dear Mr. Golubock:

This to acknowledge that the United States Environmental Protection Agency (USEPA) has completed it review of your Part A Hazardous Waste Permit Application and your letter of November 18, 1982 , requesting the withdrawal of your permit application. According to the information which you have submitted, the wastes which are treated, stored or disposed at your facility are not defined as a hazardous waste in 40 CFR 261.3. It is the opinion of this office, based on the information submitted that your facility is not required to have a hazardous waste permit under Section 3005 of the Resource Conservation and Recovery Act at this time. Please be advised that you must still comply with any applicable State and local requirements.

You will retain your USEPA Identification number if you notified that the facility is a generator or transporter of a hazardous waste.

Please contact the Technical, Permits and Compliance Section at (312) 353-2197 for assistance if you have any questions. Please refer to "Withdrawa" of Part A (Non-Hazardous Waste)," in all telephone contacts and correspondence.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief

Waste Management Branch

cc: Mr. H.C. Goodwin, Plant Manager

ILEPA V

Pioneer Division

Witco Chemical Corporation, 802 Ash Street, Lawrenceville, Illinois 62439 Telephone (618) 943-3341

November 18, 1982

Mr. Karl J. Klepitsch, Jr., Chief Waste Management Branch U.S. Environmental Protection Agency Region V 111 West Jackson Blvd. Chicago, IL 60604

DEC 1 1982

WASTE MANAGEMENT BRANCH EPA, REGION V

Request for information - Raw material storage Facility: Witco Chemical Corporation Lawrenceville, Illinois USEPA ID No.: ILD 006 301 840 6,750,67

Dear Sir:

This is to acknowledge receipt of your letter dated 10 November, 1982 and to furnish documentation on the conversation between your Mr. David Homer and our Plant Manager, Mr. H. C. Goodwin.

As stated to Mr. Homer, the manufacturing facilities at Lawrenceville, Illinois do not store at the present time or generate any hazardous materials as defined in RCRA regulations. In 1980 we were made aware that a heating oil medium known by the trade name of Dowtherm "C" could possibly be contaminated with an excess amount of PCB's and/or MCB's. A laboratory analysis verified this information. The contaminated Dowtherm "G" was supplied from another facility and was not a product of our manufacturing operation at either facility. When we became aware of this problem we immediately instituted steps to comply with all pertinent regulations in force at that time to remove the substance from our facility. The equipment concerned was thoroughly cleaned and the contaminated Dowtherm was disposed of by incineration in the Ensco plant at Eldorado, Arkansas this year.

Consequently, based on the above, we have no hazardous or toxic chemicals in storage at this facility with the exception of one 900 KVA electrical transformer which is charged with inerteen. We are aware of regulations concerning the disposal of this transformer if and when required. However at the present time the transformer does not leak and it is in very good operating condition.

Based upon all the data supplied to you, we ask that you resend our application for a permit as required under Section 3005 of the Resource, Conservation and Recovery Act. If there are any changes in the future which might mean we would have to comply with this act, you would be immediately notified.

Mr. Karl J. Klepitsch, Jr., Chief November 18, 1982 Page 2

Sincerely yours,

WITCO CHEMICAL CORPORATION Pioneer Division

Harvey L. Golubock Vice President

Witco

Witco Chemical Corporation, 520 Madison Avenue, New York, NY 10022 Telephone (212) 605-3800

ADDITIONAL INFORMATION IS FILED WITH MID 081 601 122

May 10, 1983

Regional Administrator
"Attention: RCRA Financial Requirements"
Environmental Protection Agency
230 South Dearborn Street
Chicago, Il 60604



WASTE MANAGEMENT BRANCH

I am the Chief financial officer of Witco Chemical Corporation, 520 Madison Avenue, New York, N. Y. 10022. This Letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage as specified in Subpart H of 40 CFR Parts 264 and 265.

The owner or operator identified above is the owner or operator of the following facilities for which liability coverage is being demonstrated throught the financial test specified in Subpart H of 40 CFR Parts 264 and 265:

IX. DESCRIPTION OF HAZARDOUS WASTES

		I.D FOR OFF	ICIAL USE ONLY
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X. DESCRIPTION OF HAZARDOUS WASTES (co	entinued from front	3_112	[3 [14] 15
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LISTED INFECTIOUS WASTES. Enter the four-digit hospitals, medical and research laboratories your installa			from hospitals, veterinary
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CERTIFICATION			er Al
certify under penalty of law that I have person ttached documents, and that based on my inqui believe that the submitted information is true, a uitting false information, including the possibility	ry of those individuals immediately accurate, and complete. I am aware	responsible for obtain	ung the information,
inature,	NAME & OFFICIAL TITLE (type or I	rint)	DATE SIGNED

H. C. GOODWIN, PLANT MANAGER

10-22-80

EPA Form 8700-12 (6-80) REVERSE

U.S. L. IRONMENTAL PROTECTION AGENCY NOTIFICATION OF HAZARDOUS WASTE ACTIVITY INSTRUCTIONS: If you received a proprinted	Constitution and the second
INSTALLA- INSTALLA- TION'S EPA LD. NO. INSTALLA- Information on the label is incorrect, draw a line through it and supply the correct information	
in the appropriate section below. If the label is complete and correct, leave Items !, II, and II below blank. If you did not receive a preprinted	ļ
INSTALLA- label, complete all items. "Installation" means a single site where hazardous waste is generated	100
MAILING ADDRESS PLACE LABEL IN THIS SPACE treated, stored and/or disposed of, or a trans	
00 730 AUG 20 to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The	- 15
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I. NAME OF INSTALLATION	
WITCO CHEMICAL CORP	
II. INSTALLATION MAILING ADDRESS STREET OR P.O. BOX	
3 PO BOX 535	
CITY OR TOWN ST. ZIP CODE	
4LAWRENCEVILLE	
III. LOCATION OF INSTALLATION STREET OR ROUTE NUMBER	4
5 802 ASK ST	White Sept Street
CITY OR TOWN ST. ZIP CODE	- CHINESE PROPERTY.
6 LANRENCEVILLE 1 L62439	Salvice Services
IV. INSTALLATION CONTACT	4
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A. NAME OF INSTALLATION'S LEGAL OWNER	
BWITCO CHEMICAL CORP	THE COMMONSTRATE
(enter the appropriate letter into box) VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))	
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VII. MODE OF TRANSPORTATION (transporters only – enter "X" in the appropriate box(es))	
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VIII. FIRST OR SUBSEQUENT NOTIFICATION	
Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification if this is not your first notification, enter your Installation's EPA I.D. Number in the space provided below. C. INSTALLATION'S EPA I.D. NO.	-
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A. FIRST NOTIFICATION B. SUBSEQUENT NOTIFICATION (complete item C)	

EPA Form 8700-12 (6-80)

AUGUA 1980

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CONTINUE ON REVERSE

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VIII. OPERATOR INFORMATION	ME	B. Is the name listed in
		Item VIII-A also the owner?
8 WITCO CHEMICAL CORP	<u> </u>	XES □ NO
c. STATUS OF OPERATOR (Enter the appropriate letter into	the answer box: if "Other" specify) D. P.	HONE (area code & no.)
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Attach to this application a topographic map of the area ext		
the outline of the facility, the location of each of its existing treatment, storage, or disposal facilities, and each well whe		
water bodies in the map area. See instructions for precise req		
XII. NATURE OF BUSINESS (provide a brief description)		
,		
WITCO CHEMICAL CORP., PIONEER DIVISION		=
OF ASPHALTIC PRODUCTS, SERVING INDUSTR	IES FROM ROOFING TO TRANSFORMERS TO	RUBBER PLANTS.
	•	
XIII, CERTIFICATION (see instructions)		
I certify under penalty of law that I have personally examin	ned and am familiar with the information submitted	in this application and all
attachments and that, based on my inquiry of those pers	ons immediately responsible for obtaining the info	rmation contained in the
application, I believe that the information is true, accurate false information, including the possibility of fine and impris		nt penalties for submitting
	. SIGNATURE	C. DATE SIGNED
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M. MacBURNEY, GENERAL MGR. PIONEER DIV	IM Wither IT of which	14/10
COMMENTS FOR OFFICIAL USE ONLY		
c	<u>, , , , , , , , , , , , , , , , , , , </u>	
15 16 PA Form 3510-1 (6-80) REVERSE		55.]

Please print or type in the unshaded areas only (fill—in areas are spaced for elite type, i.e., 12 characters/inch). FORM ENVIRONMENTAL PROTECTION AGENCY HAZARDOUS WASTE PERMIT APPLICATION. Consolidated Permits Program

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II. FIRST OR REVISED APPLIC	ATION											
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A. FIRST APPLICATION (place of											k e l a s .	
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B. REVISED APPLICATION (p/d	SINCE THE E	ARLY 190 d complete li	O'S. em Labov	S) CAV Oberk	AT LING	UNDER A 555	4 75 76	77 76				
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III. PROCESSES — CODES AND						h	-1 00 00 0 5-					6.00.2
A. PROCESS CODE — Enter the code entering codes. If more lines are n describe the process (including its	eeded, enter the cod	le(s) in the spa	ace provid	ed. If a	process i	will be used that is						
B. PROCESS DESIGN CAPACITY —	•	, ,	-									
AMOUNT — Enter the amount UNIT OF MEASURE — For ea	. '						codes bel	ow that desi	cribes	theu	nit of	
measure used. Only the units of	of measure that are l	isted below sh	ould be u									~
C	CESS MEASURE	ATE UNITS (FOR PROCE LCAPACITY			00/	DCESS	PRO- CESS CODE	APPROPI MEASUF	RE FO	RPR	OCES	
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Disposal:								METRIC 1 GALLONS LITERS P	FER	HOU		
	would cover	(the volume i one acre to a	that	therm	al or biole	or physical, chemica ogical treatment	il, TO4		PER	DAY	OR	
LAND APPLICATION	depth of one HECTARE-M D81 ACRES OR I	METER		surfac	e impoun	ceurring in tanks, dments or inciner- the processes in						
OCEAN DISPOSAL	D82 GALLONS P LITERS PER D83 GALLONS C	ER DAY OR		the sp	ace provid	led; Item III-C.)						
	UNITOF	PER BUT R SIL TEAD			UN	IIT OF					UNIT	r of
UNIT OF MEASURE	MEASURE CODE	UNIT OF ME	EASURE			ASURE ODE U	NIT OF M	EASURE			MEAS COI	
GALLONS.	G	LITERS PER TONS PER H						T METER				A
CUBIC YARDS	C.	METRIC TO GALLONS F	NSPER F	IOUR.		. W A	CRES					B
GALLONS PER DAY EXAMPLE FOR COMPLETING ITE	M III (shown in line	LITERS PER	and X-2 I	belawl:	A facilit	v has two storage t	anks, one i	tarik can hol	d 200	gallo	ns and	the
other can hold 400 gallons. The facil	lity also has an incind	erator that car	n burn up	to 20 g	allons per	hour.						
C DUP	13 14 15	1.11	//	//	())			1//	/ /	/ /	/ /	. \ '
S A. PRO- B. PROCESS	DESIGN CAPACI	TY		Œ,	A. PRO-	B. PROCES	SDESIG	N CAPAC	ITY			<u>-</u>
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8 K	£ 5%	4. ≥€	L 1 L 1	13/11/11/11/12/11/11

c. space for additional process codes or for describing other processes (code "T04"). For each process entered hei; e include design capacity.

IV. DESCRIPTION OF HAZARDOUS WASTES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE	CODE		METRIC UNIT OF MEASURE	CODE
POUNDS	P		KILOGRAMS	K
TONS	. T	e galaria	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code/s/ from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
 In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter
- In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

	A. EPA		C. UNIT				Ľ	D. PROCESSES
N O N	HAZARD. WASTENO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	OF MEA- SURE (enter code)	Conscionation	1. PROCES (ente	S CODES		2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T'0	3 D 8 0			
X-2	D 0 0 2	400	P	T = 0	03080			
X-3	D 0 0 1	100	P	T'0) 3 D 8 0	·	T	
X-4	002		of control that the con		T CONTRACTOR OF THE PARTY OF TH			included with above

FOR OFFICIAL USE ONLY EPA LO. NUMBER (enter from page 1) I L D 0 0 6 3 0 1 8 4 0 W DUP DUP IV. DESCRIPTION OF HAZARDOUS WASTES (continued) A. EPA HAZARD. Zó WASTENO C.UNIT D: PROCESSES B. ESTIMATED ANNUAL QUANTITY OF WASTE SURE (enter code) 1. FROCESS CODES (enter) 2. PROCESS DESCRIPTION (if a code is not entered in D(1)) (enter code) 3.5 AS PER TSCA REGULATIONS WE ARE 10,000 * D 0 0 0 P S 0 1 STORER OF PCB 2 CONTAMINATED DOWTHERM G (WHICH 7 WAS DRAINED FROM A HEAT TRANSFER 4 UNIT) DUE TO PCB CONCENTRATION 5 BEING ABOVE EPA GUIDELINE OF 500 6 PPM. WE WILL CONTINUE TO STORE 7 SAID MATERIAL UNTIL THE EPA LI-8 CENSES A HIGH TEMP INCINERATOR TO 9 DISPOSE OF SAME. 10 * THIS QUANTITY IS A ONE TIME, 11 NOT TO BE AGAIN GENERATED, 12 AMOUNT. 13 14 $D \mid 0 \mid 0$ 2 5,000 P S = 0 = 1STORING OFF-SPEC PRODUCTS IN 15 DRUMS. 16 17 18 19 20 21 22 23 24 25

ro:		(Record of Item checked	(boye)
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- Rlant Manager			9:05
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CONCLUSIONS, ACTION TAKEN OR REQUIRED			
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NFORMATION COPIES O:

H.C. GOLDWEN, PLANT MENAGER WETER. CHEMENT COMMENTER P.O. BOX 535 LAWRENZEVILLE, IL 62439

> RE: Request for Information-Hazardous Waste Permit Review (Non-Hazardous Waste) FACILITY NAME: WITCO CHIEFETCHE CONTRACT

USEPA ID NO.: 710 604 301 840

Dear M.R. Goesains:

This letter serves to acknowledge that the United States Environmental Protection Agency (USEPA) has processed your Part A Hazardous Waste Permit Application. Our review indicates your facility may not require a permit under §3005 of the Resource Conservation and Recovery Act (RCRA); however, further clarification is needed.

Based on the information submitted, your facility appears to treat, store, or dispose of a non-hazardous waste. Wastes which exhibit characteristics of ignitability, corrosivity, reactivity, or EP toxicity as defined in 40 CFR Part 261 Subpart C, or which are listed in 40 CFR Part 261 Subpart D remain subject to regulation under RCRA.

Please reexamine your wastes pursuant to 40 CFR Part 262.11 (enclosed) and submit a revised Part A application to the Regional Office within 60 days if your waste is hazardous and regulated. If you find that your waste is not regulated, please withdraw your permit application. Your written withdrawal request, with a detailed explanation, must be signed and certified by an authorized person in accordance with 40 CFR Part 122.6 (enclosed). Withdrawal of the permit application will eliminate further mandated permit processing procedures. Unless we receive a reply within 60 days, we will assume that your waste is regulated and that your facility is subject to the interim status standards including the financial responsibility and Part B permit requirements.

Please contact the Technical, Permits, and Compliance Section at (312) 353-2197, for additional information and copies of blank Part A applications. Please refer to "Part A Application--Non-Hazardous Waste," in all telephone contacts and correspondence on this matter.

Sincerely yours,

Karl J. Klepitsch, Jr., Chief Waste Management Branch

Enclosures

co: M. MAC BURNEY, GENERIAL MANAGER

W)

send maderial3

H.C. GOOWIN, PLANT MANAGER WITCO CHEMICAL COMPING P.O. BOX 535 AWRENCEVILLE, IL62439

RCRA ACTIVITIES

no this

RE: Request for Information--Hazardous Waste Permit

Review (Raw Material Storage)
FACILITY: With CAMPANY

USEPA ID NO.: JLD 006 301 840

Dear MR. COOWEN:

This is to acknowledge that the United States Environmental Protection Agency has completed reviewing your Part A Hazardous Waste Permit Application. Our review indicates your facility may not require a permit under §3005 of the Resource Conservation and Recovery Act; however, further clarification is needed.

Based on the information submitted, your facility appears to store only raw materials at your facility, and raw materials do not meet the definition of a solid waste. If this is the case, a permit is not required, and you may withdraw your permit application. Please submit your determination in writing, signed and certified by an authorized person in accordance with 40 CFR Part 122.6 (enclosed), requesting that your application be withdrawn.

If your review indicates that a permit is required, but certain information on your application is incorrect, please submit a revised Part A with the appropriate changes to this Regional Office. If no response is received in this office within 30 days, we will assume your facility requires a permit. Accordingly, we will continue to process your application.

If you have any questions, please contact the Technical, Permits, and Compliance Section at (312) 353-2197 for assistance. Please refer to "Request for Information--Raw Material Storage," in all correspondence on this matter.

Sincerely yours,

Yearl of Stepitisch of

Karl J. Klepitsch, Jr., Chief Waste Management Branch

Enclosure

CO: M. MARBURNEY, GENERAL MANAGER



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION V: 230 SOUTH DEARBORN ST. CHICAGO, ILLÍNOIS 60604

REPLY TO ATTENTION OF 5AHWM

EPA Identification Number: ILD006301840

Dear Notifier:

The U. S. Environmental Protection Agency (EPA) has received the notification (form 8700-12) which you filed pursuant to Section 3010 of the Resource Conservation and Recovery Act, 42 U.S.C. 6930. Our review of the notification shows that either all pertinent information was not included, it was illegible, or some question exists concerning final disposition of the notification. The box marked below will identify which applies, and the appropriate action on your part.



1. Pertinent information required was not included. Please complete the items circled in red.



2. The form was illegible. A new Notification Form is being returned to you for completion.



3. You have indicated you do not handle hazardous waste. If you will in the future, and would like an EPA Identification Number at this time, please resubmit the enclosed form completing the items circled in red. If you do not respond by the date indicated below your notification will be disregarded.

Please follow the instructions above returning the form and this letter to the following address by $\frac{9}{15}$ /80.

EPA Region V RCRA Activities P. O. Box 7861 Chicago, Illinois 60680

RECEIVED

AUG 2 0 1980

witco chemical corp.

Sincerely yours,

Regional Project Officer

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A. FIRST			B. SECOND	
2,999 (specify) ASPHALTIC PRODUCTS		7 2 9 5 2 (specify) ASPHA	LT COATINGS	
C. THIRD			D, FOURTH	
(specify)		c (specify)		
III, OPERATOR INFORMATION			sanda ta de de de la composición de la	
	A. NAME			B. Is the name listed in
WITCO CHEMICAL	C O R P			Item VIII-A also the owner? XYES NO
C. STATUS OF OPERATOR (Enter the ap	proprieta letter into the ensu.	er have if "Other" enecify !	D PHONE (ange and a P up 1
F = FEDERAL M = PUBLIC (other than S = STATE O = OTHER (specify)	·	pecify) CORPORATION	A 2 1 2 8	7 2 4 2 0 0
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EXISTING ENVIRONMENTAL PERMITS			Party Balance	
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B. UIC (Underground Injection of Fluids)		R (specify)		
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I. MAP		PATERONAL PATE	and the second	tario de la companya
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III. NATURE OF BUSINESS (provide a brief des				
WITCO CHEMICAL CORP., PIONI OF ASPHALTIC PRODUCTS, SERV	EER DIVISION, LOCA			
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• • •	4	. *	A	
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III. CERTIFICATION (see instructions)	de la companya da series	interest in the second		The Welling Continues
I certify under penalty of law that I have attachments and that, based on my inquapplication, I believe that the information false information, including the possibility	riry of those persons imm o is true, accurate and con	nediately responsible for a molete. I am aware that t	obtaining the information	on contained in the
NAME & OFFICIAL TITLE (type or print)	B. SIGNA		Ţc.	DATE SIGNED
M. MacBURNEY, GENERAL MGR. P.	IONEER DIV. M. F	Mar Burne	7	10/29/80
OMMENTS FOR OFFICIAL USE ONLY				

SPACE FOR ADDITIONAL PROCESS CODES OR FOR __SCRIBING OTHER PROCESSES (code "TO

SACH PROCESS ENTERED HERE

, DESCRIPTION OF HAZARDOUS WASTES

EPA HAZARDOUS WASTE NUMBER — Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number/s/ from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

ESTIMATED ANNUAL QUANTITY — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non—listed waste/s/ that will be handled which possess that characteristic or contaminant.

UNIT OF MEASURE — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE CODE
POUNDSP	KILOGRAMS, K
TONS	METRIC TONS

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code/s/ from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

TE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by pre than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- 2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

KAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds revear of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes a corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 10 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

	A. EPA		C. UNIT		ROCESSES
Ö.	HAZARD. WASTENO (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	SURE (enter code)	1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
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-2	D 0 0 2	400 .	P	T 0 3 D 8 0	
:-3	D 0 0 1	100	P	T 0 3 D 8 0	
[-4	$D \mid 0 \mid 0 \mid 2$				included with above

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	E.	PAI	.D.	ΝU	ME	ER (enter from page 1)	/	$\overline{\ }$	A	2	FO	R OFFICI	AL USE C	T/4 C \ \ \ \ \ \ \ \
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F	IV. D				[O]	N OF HAZARDOUS WASTE		con UNI		ued)	37.72			D. PROCESSES
	Zol	HA HA VAS (ent	STE	RE	⊃∤	B. ESTIMATED ANNUAL QUANTITY OF WASTE	OF SI (e	ME URE nter	A-	1	l. PROCE	SS CODES ter)	····	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
Ì	1	D D	o	\top	0	10,000 *		36 P	Ī	s 0 1	27 - 25	27 ~ 29	27 - 29	AS PER TSCA REGULATIONS WE ARE STORER OF PCB
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	3			_							1 1			WAS DRAINED FROM A HEAT TRANSFER
	4		_								· ·			UNIT) DUE TO PCB CONCENTRATION
	5	_	4	_	_						1 3			BEING ABOVE EPA GUIDELINE OF 500
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ONTINUE ON PAGE 5

Form 3510-3 (6-80)

CERTITICATION REGARDING POTENTIAL RELFASES FROM SOLID WASTE MANAGEMENT UN.

STATE: ILLINOIS 1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION YES NO Landfill Surface Impoundment Land Farm Waste Pile Incinerator Storage Tank (Above Ground) Storage Tank (Underground) Container Storage Area Injection Wells Wastewater Treatment Units Transfer Stations Waste Recycling Operations Waste Treatment, Detoxification Other 2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.	'FACILITY NAME: _	WITCO CORPORATION	
STATE: ILLINOTS 1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION YES	EPA I.D. NUMBER: _	IL0074405150	
1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION YES NO Landfill Surface Impoundment Land Farm Maste Pile Incinerator Storage Tank (Above Ground) Storage Tank (Underground) Container Storage Area Injection Wells Mastewater Treatment Units Transfer Stations Maste Recycling Operations Maste Recycling Operations Maste Treatment, Detoxification Other 2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.	OCATION CITY: _	CHICAGO	
closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION YES NO Landfill Surface Impoundment Land Farm Maste Pile Incinerator Storage Tank (Above Ground) Storage Tank (Underground) Container Storage Area Injection Wells Mastewater Treatment Units Transfer Stations Maste Recycling Operations Maste Recycling Operations Maste Treatment, Detoxification Other 2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.	STATE: _	ILLINOIS	
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	Surface Importance Land Farm Waste Pile Incinerator Storage Tank Container St Injection We Wastewater T Transfer Sta Waste Recycl Waste Treatm Other If there are "Y provide a descr of in each unit would be consid RCRA. Also inc disposed of and of each unit an	(Above Ground) (Underground) orage Area lls reatment Units tions ing Operations ent, Detoxification Tes" answers to any of the items in Number 1 above, please ription of the wastes that were stored, treated or disposed In particular, please focus on whether or not the wastes lered as hazardous wastes or hazardous constituents under lude any available data on quantities or volume of wastes the dates of disposal. Please also provide a description and include capacity, dimensions and location at facility.	

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

in your Part A application, please d	e and also those hazardous waste units describe for each unit any data availates of hazardous wastes or constituents curred in the past or may still be
Please provide the following informa	ition
 a. Date of release b. Type of waste released c. Quantity or volume of waste release d. Describe nature of release (i.e. or tank, etc.) 	
that exists as a result of such rele	extent of environmental contamination eases. Please focus on concentrations of esent in contaminated soil or groundwater
	·
prepared under my direction or supe designed to assure that qualified pe the information submitted. Based of who manage the system, or those per	ersonnel properly gather and evaluate n my inquiry of the person or persons
true, accurate, and complete. I am	to the best of my knowledge and belief, aware that there are significant penal- on, including the possibility of fine
true, accurate, and complete. I am ties for submitting false informati and imprisonment for knowing violat	to the best of my knowledge and belief, aware that there are significant penalon, including the possibility of fine ions. (42 U.S.C. 6902 et seq. and